

## REMARKS

Claims 1, 2, 6, 7, 11-13 and 17 are rejected under 35 U.S.C. 103(a) as being unpatentable over Bawendi et al., US Patent 6,501,091 (hereinafter "Bawendi") in view of Camras et al. U.S. publication 2002/0030194. Applicants respectfully traverse the rejection.

Claim 1 recites, among other things, "a second fluorescent material layer comprising a second wavelength converting material comprising a phosphor capable of emitting third light having a third peak wavelength longer than the second peak wavelength, wherein the second fluorescent material layer is disposed adjacent to the semiconductor light emitting device . . ."

Red light has a longer wavelength than green light. In Bawendi's Fig. 1 device, the quantum dots 22 that emit red light (longer wavelength light) are separated from the primary light source 10 by the quantum dots 18 that emit green light. See, for example, column 5 lines 62-67, which recite "[i]n the embodiment shown in FIG. 1, the primary light first passes through a layer 16 of quantum dots 18 of a material and size adapted to emit green secondary light. The primary light which has not been absorbed by the first layer and the secondary light then pass through a second layer 20 of quantum dots 22 of a material and size adapted to emit red secondary light." In Bawendi's Fig. 1 device, the quantum dots that emit longer wavelength light are **separated** from the primary light source by a second layer of quantum dots. Accordingly, Bawendi's Fig. 1 does not teach a wavelength converting layer capable of emitting **longer wavelength light disposed adjacent** to the semiconductor light emitting device, as taught in claim 1. Camras et al. is cited as teaching that quantum dots and phosphor particles are art recognized equivalents and adds nothing to the deficiencies of Bawendi with respect to claim 1. Thus, claim 1 is allowable over Bawendi and Camras et al. because even in combination, Bawendi and Camras et al. fail to teach every element of claim 1.

Claims 2, 6, 7, 11-13, and 17 depend from claim 1 and are therefore allowable over Bawendi and Camras et al. for at least the same reasons as claim 1.

Applicants thank the Examiner for indicating that claims 3-5 and 14-16 are allowable if amended into independent form. Applicants thank the Examiner for allowing claims 18-27.

In view of the above arguments, Applicants respectfully request allowance of all pending claims. Should the Examiner have any questions, the Examiner is invited to call the undersigned at (408) 382-0480.

Respectfully submitted,

/Rachel V. Leiterman/

Rachel V. Leiterman  
Attorney for Applicants  
Reg. No. 46,868